

KELS LP, Greeley's Response as requested by the FCC for Report on Broadcast Localism and Notice of Proposed Rulemaking adopted by the Commission on December 18, 2007, and released on January 24, 2008.

Creating permanent advisory committees for the purpose of advising licensees on programming content would simply be making LPFMs homogenous, defeating the reasons for creating such a service. Also such committees, having been mandated by the federal government, would undoubtedly bring all the old problems of another layer of bureaucracy, including ego and senseless regulations. Community activists would eagerly seek to impose their narrow views of what should and should not be broadcast without regard to the many factors each broadcaster must weigh in making programming choices. The quality and variety of programming would inevitably suffer. And really the only thing that would be accomplished is defeating the very thing the commission attempted in bringing in LPFMs, unique, local free and fun radio.

Leave LPFMs free. If they fail, let them fail and disappear and allow the free market to cull.

The proposal that stations have operational personnel on duty 24 hours a day is utterly abhorrent. The costs alone would be terminal. However, in the spirit of true localism, I think the idea behind this thought is good. As we explore this, it does seem to have merit in keeping the juke box boys out. Though more regulations are almost never good, causing loopholes and cheats, let's mandate a live local operator, defined even by remote administration through a computer portal, a couple hours a day at the station's best discretion.

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